

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Veronica Tate
NAME OF THE PLAINTIFF

- VS -

Sweetie Pies
4270 Manchester Ave.
St. Louis Mo. 63110

NAME OF THE DEFENDANT OR
DEFENDANTS (Enter above the full name(s) of
ALL defendant(s) in this lawsuit. Please
attach additional sheets if necessary.

Case No.

JURY TRIAL DEMANDED

YES ☒ NO ☐

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.
NOTE: *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).
NOTE: *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

☐ American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.
NOTE: *In order to bring suit in federal district court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

Other (Describe)

PARTIES

2. Plaintiff's name: Veronica Tate

Plaintiff's address: 2506 N. Sarah St.
Street address or P.O. Box

ST. Louis Mo. 63113
City/ County/ State/Zip Code

314-792-5199
Area code and telephone number

3. Defendant's name: Sweeties Pies

Defendant's address: 4270 Manchester
Street address or P.O. Box

ST. Louis Mo. 63110
City/County/State/ Zip Code

314-371-0304
Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

October 19 2012 - October 25 2012

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

____ Yes Date filed: _____

☒ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: 2-11-13

____ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes _____ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

____ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

____ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☒ termination of my employment

☐ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☐ other conduct (specify): _____

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

☐ race

☐ religion

☐ national origin

☐ color

☒ gender

☐ disability

☐ age (my birth date is: _____)

☐ other: _____

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

From: Veronica Tate tateveronica@ymail.com
Subject: Sweetie Pies
Date: July 28, 2014 at 1:30 PM
To: Veronica Supershero Tate tateveronica@ymail.com

Start Date: 10-19-12

On the first day, Ike stared at me as if he had sexual feelings for me. As the day went on, he would come by me and tell me in beautiful. I told him I'm married, but he didn't care. He would pass by my work station and brush me with his hands on my waist, behind and hips constantly. And then, Ike slid into the kitchen behind me and bumped me so hard against the back of my body that I felt his penis on my behind. I just laughed it off because I didn't want to get fired because Ike is the supervisor. I was very uncomfortable with the whole situation. This went on until I got off work at 8 pm (the bumping, flirting, and touching). The next work time which was 10-25-12, the sexual harassment has increased. I had been touched all day by Ike, bumped up sexually again from behind over the course of the day. Then Ike came in the kitchen with a sweet potato under his apron as if he had a erection and stated, "This is what I'm workin' with. This what I got for you", and attempted to pump me with it, and then he smacked it several times on my work station table, while making other sexual comments. Then later on, I went into the fridge and Ike came in behind me, and asked me if I wanted him in there, and I said no. Then he closed the refrigerator door after I said I didn't want him in there and he said what's up in a sexual manner with sexual expressions on his face. and I stated no I'm leaving out of here and I told him, "you stay". And he opened the door and stated, "I want you to pass in front of me to get out" and the fridge was 2 feet wide, as I was thinking I was afraid of being hemmed up in there, I demanded he leave out first. Later that day, Ike came up to me with money folded in his hand, and stated to me, "fuck that can I put a down payment on it" (referring to my vagina). and I said no and did not respond. Then he came close behind me in my ear, to where he was in my personal space, with more money and said, "fuck that what's up, I gotta pocket full of money, and all I wanna do is eat that pussy", I did not report it then because Ike is the supervisor. The next work day was 10-28-12, I reported it that morning to the manager Chris and the head cook Mrs. Barbara. After reporting to them Ike's behavior, Mrs. Barbara said, "That's Ike, that's how he is", and then they asked me if I still wanted to work there, and I said yes without the harassment. So I worked for 15 minutes and Chris and Barbara came to my work station and escorted me off the premises and told me to go to the other restaurant to talk to Charles Bussey. I went to see Mr. Bussey and he took my statement and copied my ID and told me he will get back with me. I didn't hear anything for 2 weeks so I sent a certified letter to both of the restaurants for Chris the manager and Charles Bussey. After sending certified letters and emails and phone calls. Mr. Bussey finally called me and asked me if I wanted to come in to work at the other restaurant, but I was already working at my old job.

From: Veronica Tate tateveronica@gmail.com
Subject: SWEETIE PIES
Date: November 29, 2012 at 6:27 AM
To: CNG@Schuchatew.com

I just wanted to let u know that I want to come back to work. I enjoy working there and you said I was doing a good job and you wanted to put me on permanently. I haven't heard anything from anyone since I made a sexual harassment complaint. I want to know if I'm still employed there or what's going on. I haven't been called to work in over two weeks. It's unfortunate that I put in a sexual harassment complaint and now I haven't been called to work since. Please call me and let me know something. Thank you.

13. The acts set forth in paragraph 12 of this complaint:

_____ are still being committed by the defendant.

_____ are no longer being committed by the defendant.

☒ _____ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;
cite no cases or statutes.

Review the case and if there are any
wrong doing I want to be compensated
for sexual harassment-retaliation-Defamation
of character

Signed this 14 day of October, 20 14.



Signature of Plaintiff